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Comments to SEC on high-pressure gas pipeline rules

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VIA email (rulemaking@sec.nh.gov)
Pamela Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit St. Suite 10
Concord NH 03301

Response to Request for Advance Public Comment on Rules Related to Certificates of Site and Facility, Site 300

Dear Administrator Monroe.

Thank you for the opportunity to comment regarding Site 300 rulemaking for high-pressure gas pipelines.

Specifically, I wish to comment on,

“301.03, h "(6) For a proposed wind energy facility, information regarding the cumulative impacts of the proposed facility on natural, wildlife, habitat, scenic, recreational, historic, and cultural resources, including, with respect to aesthetics, the potential impacts of combined observation, successive observation, and sequential observation of wind energy facilities by the viewer;”

I believe that we also need cumulative impact guidance in these rules for the siting of pipelines. Suggested addition,

301.03, h (9) For a proposed natural gas transmission pipeline and associated infrastructure, information regarding the cumulative impacts of the proposed facility on natural, wildlife, habitat, scenic, recreational, historic, and cultural resources, including, with respect to the goals of the 2014 New Hampshire 10 Year State Energy Strategy, the potential impacts of reduced fuel diversity through oversupply of a single fuel source, diversion of ratepayer and institutional funding from renewable and demand response projects in favor of fossil fuel infrastructure, and cumulative impact of tariffs imposed on ratepayers via long term capacity contracts.

I feel strongly that the cumulative impact of natural gas pipelines on our NH State Energy Strategy is at least as crucial as the cumulative impact of wind turbines on visual aesthetics. Although 301.16 includes requests for information on public welfare, economics, environmental impacts, etc.; it does so without the context of competing projects. Too much reliance on a single fuel source to meet electric generation needs

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leaves New Hampshire and New England vulnerable to an “all the eggs in one basket” scenario. Fuel diversity is highlighted throughout the State Energy Strategy as essential to stabilizing energy costs and protecting reliability of the grid.

Thank you very much for considering my input.

Sincerely,

Patricia A. Martin